

EXHIBIT 1

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

TECHNOLOGY INNOVATIONS ASSOCIATES
LLC,

Plaintiff,

v.

PANTECH CORP, ET AL.,

Defendants.

C.A. No. 13-352-LPS

JURY TRIAL DEMANDED

TECHNOLOGY INNOVATIONS ASSOCIATES
LLC,

Plaintiff,

v.

GOOGLE INC.,

Defendant.

C.A. No. 13-355-LPS

JURY TRIAL DEMANDED

TECHNOLOGY INNOVATIONS ASSOCIATES
LLC,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO. LTD, ET. AL.

Defendants.

C.A. No. 13-356-LPS

JURY TRIAL DEMANDED

DEFENDANTS' JOINT PROPOSED CONSTRUCTIONS

Pursuant to the Court's Order Regarding Process for Early Claim Construction dated April 8, 2014, Defendants Google Inc., Pantech Wireless, Inc., Samsung Electronics Co. Ltd., Samsung Electronics America Inc., and Samsung Telecommunications American LLC, (collectively, "Defendants") hereby provide their joint proposed constructions and citations to the intrinsic evidence for the "sticky path" phrases/terms in the claims of U.S. Patent Nos. 8,280,932 ("the '932 patent") and 7,840,619 ("the '619 patent").

Claim(s):	Claim Terms	Proposed Construction	Preliminary Identification of Intrinsic Evidence:
'932 patent: 1, 6, 8, 10-16 '619 patent: 1	"sticky path"	"A multi-line area, separate from a scrollable area, that dynamically expands and collapses to always display the hierarchical path to the top item in the scrollable area."	<u>Provisional Application (Serial No. 60/396439):</u> Pgs. 11-12, 27-28 <u>'619 patent specification:</u> 9:31-38; figs. 12a and 12b; 10:29-30; 14:55-15:3; 19:66-20:2; 31:59-33:11 <u>'932 patent specification:</u> 9:34-40; figs. 12a and 12b; 10:29-30; 14:55-15:3; 19:64-67; 31:51-32:-67 <u>April 6, 2012 Response to Office Action in Application No. 13/272,028 ('932 patent):</u> Pgs. 10-11 <u>July 10, 2006 Response to Office Action in Application No. 10/621,689 (U.S. Patent No. 7,275,063):</u> Pgs. 17-18; September 12, 2006 Submittal of Archival Copies of Demonstration Movies 1-3 Record of Telephone Interview <u>October 25, 2006 Response to Office Action in Application No. 10/621,689 (U.S. Patent No. 7,275,063):</u> Pgs. 11-12, 18-22
'932 patent: 1, 6, 8-16 '619 patent: 1	"path"	No construction necessary, but to the extent the Court wishes to construe "path," it means "the name of the object itself, prefixed by the names of the nested containers in which the object exists in outermost order"	<u>Provisional Application (Serial No. 60/396439):</u> Pgs. 27-28 <u>'619 patent specification:</u> 32:19-24 <u>'932 patent specification:</u> 32:10-16

Claim(s):	Claim Terms	Proposed Construction	Preliminary Identification of Intrinsic Evidence:
'932 patent: 1, 6 '619 patent: 1	"sticky path display portion" / "sticky path portion"	"A portion of a view where a sticky path is displayed"	See intrinsic evidence for "sticky path" above.
'619 patent: 1	"sticky path display area"	"An area of a view where a sticky path is displayed"	See intrinsic evidence for "sticky path" above.
'932 patent: 8	"sticky path display region of said view"	"A region of a view where a sticky path is displayed"	See intrinsic evidence for "sticky path" above.

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CERTIFICATE OF SERVICE

I, Bindu A. Palapura, hereby certify that on April 14, 2014, true and correct copies of the within document were served on the following counsel of record at the addresses and in the manner indicated:

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EXHIBIT 2

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

TECHNOLOGY INNOVATIONS
ASSOCIATES LLC,

Plaintiff,

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GOOGLE INC.,

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C.A. No. 13-355-LPS

JURY TRIAL DEMANDED

TECHNOLOGY INNOVATIONS
ASSOCIATES LLC,

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SAMSUNG ELECTRONICS CO. LTD., et al,

Defendants.

C.A. No. 13-356-LPS

JURY TRIAL DEMANDED

PLAINTIFF’S PROPOSED CONSTRUCTIONS

Pursuant to the Court’s Order Regarding Process for Early Claim Constructions dated April 8, 2014, Plaintiff Technology Innovations Associates LLC hereby provides its proposed constructions and citations to the intrinsic evidence for the “sticky path” phrases/terms in the claims of U.S. Patent Nos. 8,280,932 (the “’932 Patent”) and 7,840,619 (the “’619 Patent”).

Claim Term	Plaintiff’s Proposed Construction	Plaintiff’s Intrinsic Evidence
“sticky path”	An area, separate from a scrollable area, that dynamically updates to display the path to the top item in the scrollable area	<p><u>U.S. Patent No. 7,840,619:</u> Col. 9, ll. 31-38; Col. 14, l. 42- Col. 15, l. 3; Col. 31, l. 59- Col. 33, l. 10; Col. 38, ll. 28-33; Figs. 12a and 12b</p> <p><u>Pros. Hist. of ’619 Patent:</u></p> <p>Response to Office Action filed 5-12-10 at p. 11; Response to Office Action filed 8-13-10 at p. 8</p>

		<p><u>U.S. Patent No. 8,280,932:</u> Col. 9, ll. 34-40; Col. 14, l. 42-Col. 15, l. 3; Col. 31, l. 50-Col. 32, l. 67; Col. 37, l. 66- Col. 38, l. 4; Figs. 12a and 12b</p> <p><u>Pros. Hist. of U.S. Patent No. 8,280,932:</u></p> <p>Response to Office Action filed 4-6-12 at pp. 10-11; Notice of Allowability of 6-6-12 at pp. 3-5</p> <p><u>Pros. Hist. of U.S. Patent No. 7,275,063:</u></p> <p>Response to Office Action filed 7-10-06 at pp. 17-18; Archival CD QuickTime movies filed 9-12-06; Response to Office Action filed 9-13-06 at p. 10; Response to Office Action filed 10-25-06 at pp. 11-12, 18-22</p>
path	No construction necessary	
sticky path display portion/sticky path portion	No construction necessary beyond construction of “sticky path”	
sticky path display area	No construction necessary beyond construction of “sticky path”	
sticky path display region of said view	No construction necessary beyond construction of “sticky path”	

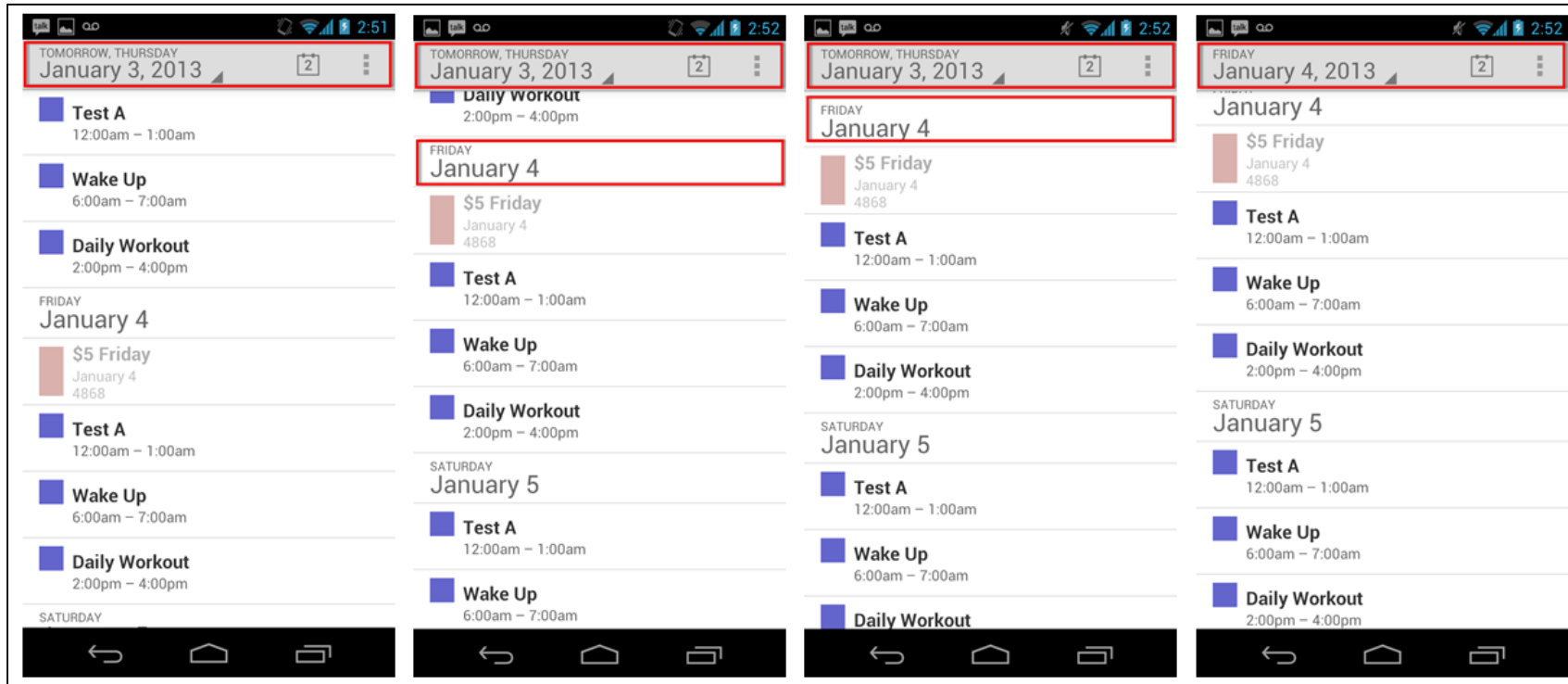
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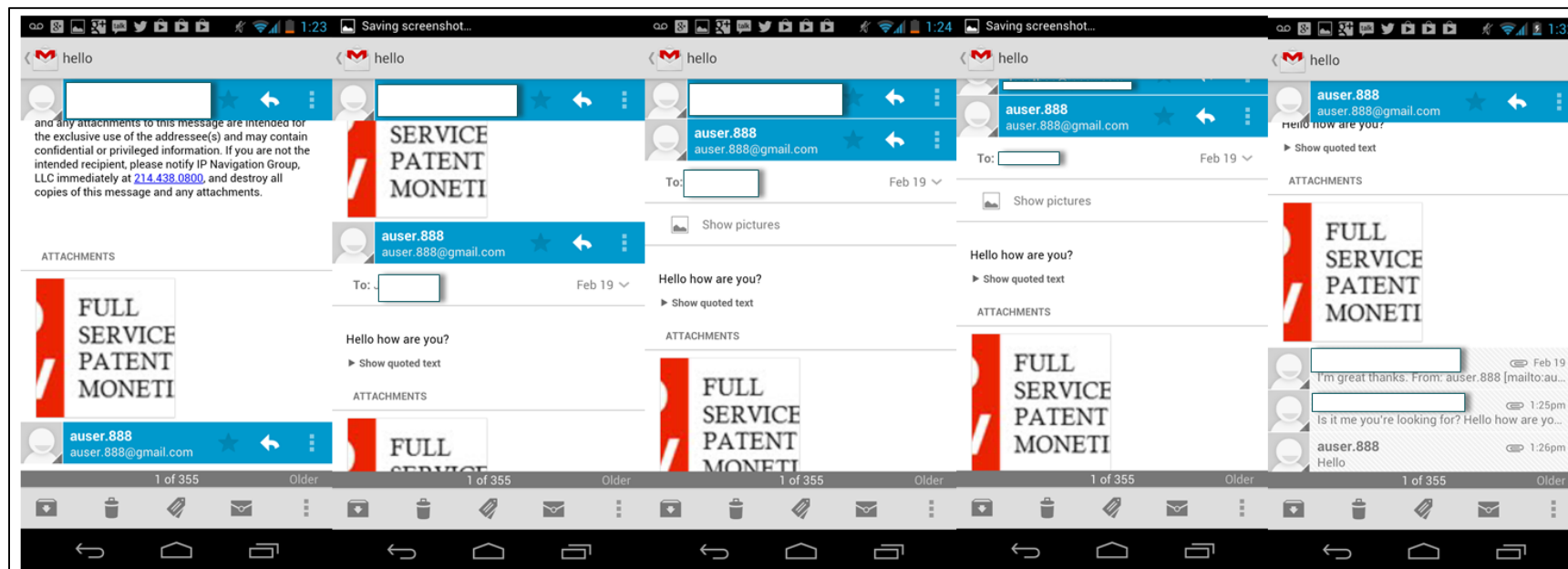
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EXHIBIT 3





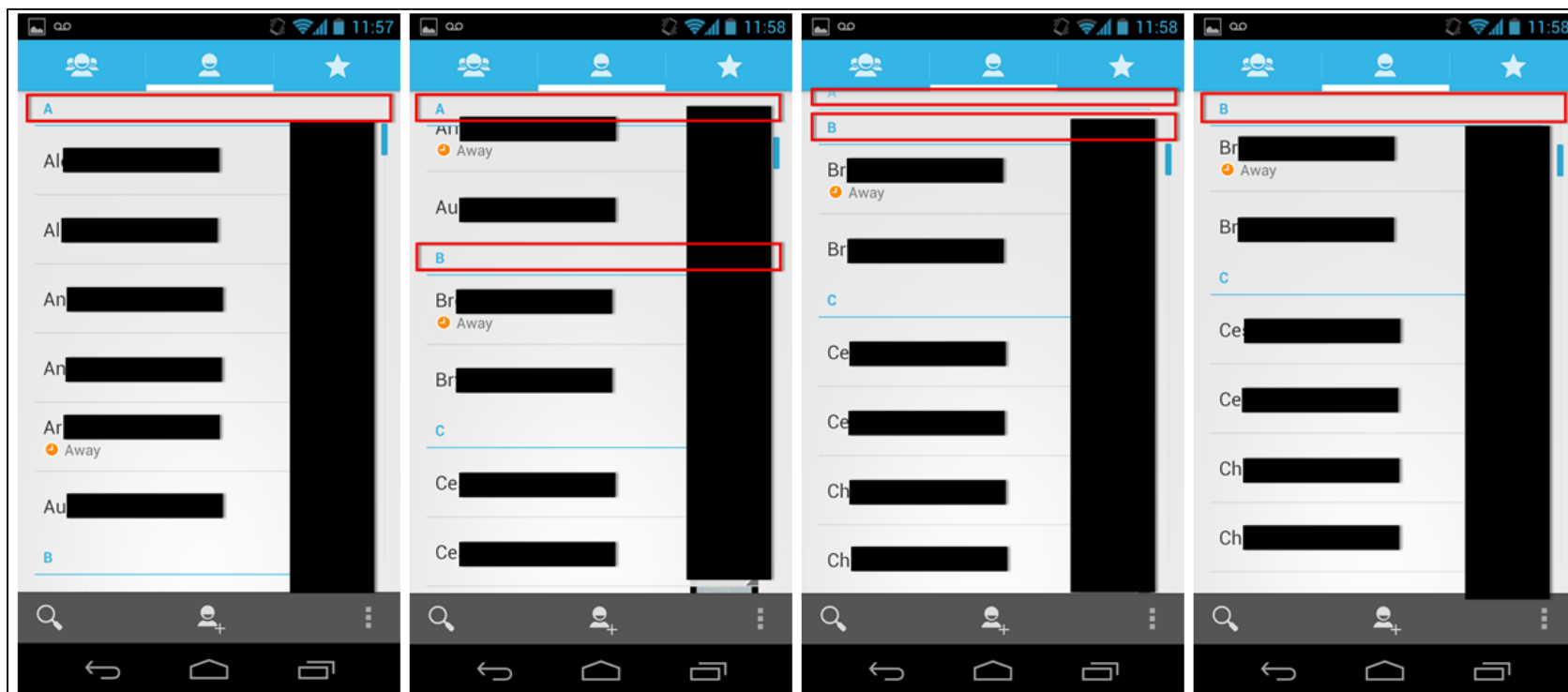


EXHIBIT 4

